

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT GEORGIA  
ROME DIVISION**

In re:	)	Chapter 13
	)	
LAURA ANN OLIVER,	)	Case No. 13-40181
	)	
Debtor.	)	Judge Diehl
_____	)	

**OBJECTION TO CONFIRMATION OF  
DEBTOR'S FIRST AMENDED CHAPTER 13 PLAN**

Hawks Farm Home Owners Association, Inc. ("Hawks") hereby objects to confirmation of Debtors' First Amended Chapter 13 Plan as follows:

1. On February 1, 2013, Debtor filed her First Amended Chapter 13 Plan (the "Plan"). (Doc. No. 7.)
2. Debtor's Plan fails to include payment of debt owed to Hawks on account of homeowners association dues. While Debtor failed to schedule the debts owed to Hawks, Hawks is a secured creditor of Debtor by virtue of the filing of the liens, which are attached hereto as Exhibit A. Thus, Debtor's Plan violates 11 U.S.C. § 1325(a)(5).
3. Debtor's Plan also fails to include payment of quarterly expenses in the amount of \$400.00 due to Hawks for homeowners association dues.
4. Accordingly, Hawks respectfully requests that the Court deny confirmation of Debtor's Plan.

[SIGNATURE ON FOLLOWING PAGE]

This 22<sup>nd</sup> day of April, 2013.

Respectfully submitted,

**MORRIS, MANNING & MARTIN, LLP**

3343 Peachtree Road, N.E.  
Suite 1600  
Atlanta, Georgia 30326  
(404) 233-7000

By: /s/ Lisa Wolgast  
Lisa Wolgast  
Georgia Bar No. 773399

*Attorneys for Hawks Farm Home Owners  
Association, Inc.*

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**CERTIFICATE OF SERVICE**

I certify that I have this day served a true and correct copy of the within and foregoing

**OBJECTION TO CONFIRMATION OF DEBTOR'S FIRST AMENDED CHAPTER 13**

**PLAN** upon:

Laura Ann Oliver  
27 Hawks Farm Rd  
White, GA 30184

Brian R. Cahn  
Perrotta Cahn & Prieto, P.C.  
5 S. Public Square  
Cartersville, GA 30120

Mary Ida Townson  
Suite 2200  
191 Peachtree Street, NE  
Atlanta, GA 30303-1740

U.S. Trustee  
Office of the United States Trustee  
75 Spring Street, SW, Room 362  
Atlanta, GA 30303

by mailing a copy of same via United States Mail with sufficient postage to ensure delivery.

This 22<sup>nd</sup> day of April, 2013.

By: /s/ Lisa Wolgast  
Lisa Wolgast  
Georgia Bar No. 773399

*Attorneys for Hawks Farm Home Owners  
Association, Inc.*